

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
SHERRY LYNN YOUNG, :
Debtor : CHAPTER 13
:
JACK N. ZAHAROPOULOS, :
STANDING CHAPTER 13 TRUSTEE, :
Movant : CASE NO. 1-24-bk-03162-HWV
:
SHERRY LYNN YOUNG, :
Respondent :
:

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 5th day of May 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. Trustee avers that Debtor's Plan cannot be administered due to the lack of the following:

- a. Debtor has not provided Trustee with paystubs for the month of December 2024 and January 2025 for the Administrative Assistant job.
- b. Debtor has not provided Trustee with a six (6) month Profit and Loss Statement.

2. The Plan has not been served as required by Local Rule 3015-1(b) as to the creditors listed in Paragraphs 2.E. and 2.G. of the Plan. Specifically, Hyundai Motor Finance must be served pursuant to Rule 7004.

3. Debtor's Plan violates 11 U.S.C. §1322(a)(1) and §1325(b) in that Debtor has not submitted all or such portion of the disposable income to Trustee as required. More specifically,

Trustee alleges, and therefore avers, that Debtor's disposable income is greater than that which is committed to the Plan based upon disposable income on Schedules I and J and specifically disputes the following amounts:

- a. Excess disposable income.

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 5th day of May 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Joseph Leo Quinn, III, Esquire
Ross, Quinn & Ploppert, P.C.
192 South Hanover Street
Suite 101
Pottstown, PA 19464-6096

/s/ Derek M. Strouphauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee